

January 20, 2025

AO91 (Rev. 12/03) Criminal Complaint

Nathan Ochsner, Clerk of Court

UNITED STATES DISTRICT COURT

Southern District Of Texas Corpus Christi Division

UNITED STATES OF AMERICA**CRIMINAL COMPLAINT**

vs.

Case Number: 2:25-MJ-0047

Kennedy SANTOYO-Villa

I, the undersigned complainant state that the following is true and correct to the best of my

knowledge and belief. On or about January 20, 2025 in Brooks County, inthe Southern District Of Texas defendant(s)

Kennedy SANTOYO-Villa, a native and citizen of Mexico, and an alien who had been previously deported from the United States was found unlawfully within the United States in Falfurrias, Texas, the said defendant having not obtained the consent of the Attorney General or the Secretary of the Department of Homeland Security for application for readmission into the United States,

in violation of Title 8 United States Code, Section(s) 1326(a)(1)I further state that I am a(n) Border Patrol Agent and that this complaint is based on the

following facts:

On January 20, 2025, Border Patrol Agents encountered Kennedy SANTOYO-Villa, attempting to circumvent the United States Border Patrol Checkpoint near Falfurrias, Texas. Agents determined SANTOYO-Villa to be a citizen and national of Mexico without any immigration documents that would allow him to enter or remain in the United States legally. Record checks revealed SANTOYO-Villa was ordered removed from the United States by a designated official on January 23, 2014 and was physically removed from the United States to Mexico on January 23, 2014 via Brownsville, Texas. Kennedy SANTOYO-Villa stated he last entered the United States illegally on or about January 10, 2025 near Brownsville, Texas. There is no evidence to indicate SANTOYO-Villa has applied for re-admission into the United States from any lawful authority.

I DECLARE UNDER PENALTY OF PERJURY THE STATEMENTS IN THIS COMPLAINT ARE TRUE AND CORRECT.

Continued on the attached sheet and made a part of this complaint:

☐ Yes ☒ No
Signature of Complainant

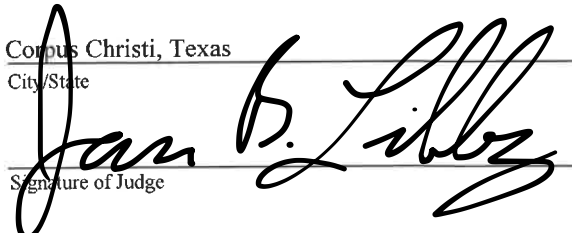
Garcia, Reynaldo D. Border Patrol Agent

Printed Name of Complainant

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed.R.Crim.P.4.1, and probable cause found on

January 20, 2025
Date

at

Corpus Christi, Texas
City/StateJason B. Libby
Name of JudgeU.S. Magistrate Judge
Title of Judge
Signature of Judge